

Brockton - Summarized Chronology

6/1/88 - MA Superior Court Civil Action 88-3194 Final Judgement - addresses POTW and collection system improvements

10/28/89 - Permit reissued - copper limit of 6.6 & 9.4 ug/l

1/1/92 - Brockton began violating its copper limit. The contract operator could not explain the cause of the violations. They have had a corrosion control program in place (add zinc polyphosphate) for about three years and did not know of any industry moving into the system that would increase copper significantly enough to affect the 18 MGD plant.

8/25/92 - Administrative Order 92-32 issued to city requiring that they determine the cause of the violations and take corrective action.

9/26/94 - Permit reissued with same copper limit

1/25/95 - Administrative Order 95-04 issued to city requiring the city submit scopes of work addressing the copper violations including development of documentation supporting site specific limits. The Order further required that the city prepare an engineering report addressing its other effluent limit violations including:

- a. an analysis of the impact of (1) high flows, and (2) operational controls on the treatment plant's inability to consistently comply with its Permit limits;
- b. recommendations for reducing flow to the plant, including infiltration and inflow reduction;
- c. recommendations for capital improvements and improved operational controls to allow the plant to handle the flow it receives without violating its Permit limits; and
- d. a schedule for implementing the recommendations for flow reduction and capital and operational improvements.

10/23/95 - EPA and MA DEP met with the city to go over the scopes. The city has a corrosion control program in place and adds iron salts at the POTW for phosphorus removal during the summer. However, they are still unable to meet their copper limit. They have historically passed their toxicity tests (acute and chronic) at 100%. It was decided that site specific criteria was not the best way to go at that time, and that the schedule in the Order would be updated through another Order.

3/24/96 - Administrative Order 96-05 issued to city with an updated schedule. CDM submitted the required Engineering Report on April 30, 1997. EPA and the MA DEP submitted comments on the report and CDM responded to the comments on July 15, 1997.

1996/1997 CDM conducts city wide I/I analysis

7/98 CDM submits city wide I/I study to MADEP

9/26/97 Meeting with Brockton, Abington, MADEP, EPA - Abington wants to put more flow into Brockton

9/30/99 - Permit reissued with more stringent copper limit and winter ammonia limit.

3/8/00 EPA and MA DEP met with the city to discuss copper and winter ammonia limits in new permit. High flow to plant and infiltration/inflow also discussed.

8/00 CDM submits SSES

8/29/00 CDM submits a draft scope of services for facility assessment.

9/27/00 I/I report per permit requirement

12/14/00 EPA and MA DEP met with the city to discuss Scope for Facility Assessment

12/21/00 CDM letter summarizing meeting

2/14/01 CDM letter follow-up to 12/14/00 meeting - wants approval to proceed with Facility Assessment

10/10/01 EPA inspects POTW - reveals spills

11/14/01 MADEP issues NON

12/3/01 City responds to NON

12/6/01 EPA issues CWA 308 IRL

1/3/02 Report of SSOs that occurred on 3/22-24/01

1/9/02 City responds to CWA 308 IRL

2/5/02 CDM submits Facility Assessment Report

2/7/02 EPA met with MADEP and MA AG

2/26/02 EPA and MA DEP met with the city - CDM does presentation on SSES and Facility Assessment

6/10/02 EPA, MA DEP and MA AG met with the city

Date: 7/9/2004

Joseph J. Shepherd
Department of Environmental Protection
Southeast Region
20 Riverside Drive
Lakeville, MA 02347

Subject: Brockton Wastewater Treatment Facility
Notification of Unauthorized Discharge or Bypass Report/Notification of Permit Exceedence

Dear Mr. Shepherd:

In accordance with Department of Environmental Protection policy, we are formally providing required written notification of the following:


- ☐ 1. Notification of Unauthorized Discharge or Bypass Report
☒ 2. Notification of Permit Exceedence

The following notification has been made:

	<u>Person Contacted</u>	<u>By Email</u>	<u>Date/Time</u>	<u>By Fax</u>	<u>Date/Time</u>
MADEP	Joseph Shepherd	X	7/9/04 7:55am	X	7/9/04 8:00am
	David Burns	X	7/9/04 7:55am		
EPA	Eric Hall			X	7/9/04 8:00am

Description and cause of noncompliance: FPE Fecal Coliform – Max. Daily 7/7 = 580/100 ml. (400/100 ml limit)

On July 7, 2004, the check valves on the sodium hypochlorite pump had crystallized, thus restricting the output of the pump. The operator grabbed his fecal coliform sample too soon after the pump was cleared, before the chlorination process had time to recover. We will check the hypochlorite feed pump more regularly here forth. We will also make certain the sample is representative by ensuring the process has had time to recover following momentary equipment failures. The fecal coliform count on the sample taken on July 8th was compliant, 84/100 ml.

By: James M. Lauzon 

Title: Project Manager

cc: Eric Hall, USEPA
David Burns, MADEP
David Norton, Brockton W&S Contract Admin.
Farzin Kiani, VVNA Business Manager